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ORACLE AMERICA, INC.

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 ORACLE AMERICA, INC.
24 Plaintiff,
25 v.
26 GOOGLE INC.
27 Defendant.

Case No. CV 10-03561 WHA
**DECLARATION OF NATHAN
SHAFFER IN SUPPORT OF
ORACLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

1 I, Nathan Shaffer, declare and state as follows:

2 1. I am a member of the State Bar of California, admitted to practice before this
3 Court, and an associate with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”),
4 attorneys of record for plaintiff Oracle America, Inc. (“Oracle”). I am familiar with the events,
5 pleadings and discovery in this action and, if called upon as a witness, I could and would testify
6 competently to the matters stated herein of my own personal knowledge.

7 2. I submit this declaration in support of Oracle’s Administrative Motion to File
8 Under Seal.

9 3. Portions of Plaintiff Oracle America, Inc.’s Opposition to Motion for Finding of
10 Civil Contempt And For Sanctions summarize, quote from, or reproduce materials that have been
11 designated by Google as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S
12 EYES ONLY” pursuant to the Protective Order. *See* ECF No. 66. Specifically, the redactions
13 marked on page 2, lines 7-11 and 12-13 have been designated pursuant to the Protective Order.

14 4. Portions of Exhibit A to the Declaration of Annette L. Hurst dated August 8, 2016
15 (“Hurst Decl.”) have been designated by Google as “CONFIDENTIAL” or “HIGHLY
16 CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order. *See* ECF
17 No. 66. Specifically, the redactions marked on pages 13-15; page 16, lines 1-23; page 18; and
18 page 19, lines 1-7 have been designated pursuant to the Protective Order.

19 5. Portions of Exhibit B to the Hurst Decl. have been designated by Google as
20 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant
21 to the Protective Order. *See* ECF No. 66. Specifically, the redactions marked on page 207, lines
22 1-25; and 208, lines 1-25 have been designated pursuant to the Protective Order.

23 6. Portions of Exhibit C to the Hurst Decl. have been designated by Google as
24 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant
25 to the Protective Order. *See* ECF No. 66. Specifically, the redactions marked on page 118, lines
26 3-6 and 24-25; and page 119, lines 1, 12, and 19-20 have been designated pursuant to the
27 Protective Order.

28 I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct.

2 Executed this 8th day of August, 2016, at San Francisco, CA.

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Nathan Shaffer